

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<hr/>	:	CHAPTER 11
	:	
DOMUS BWW FUNDING, LLC and	:	Bky. No. 22-11162(ELF)
1801 ADMIN, LLC	:	
	:	JOINTLY ADMINISTERED
Debtors	:	
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**FIRST INTERIM APPLICATION FOR COMPENSATION & REIMBURSEMENT OF  
EXPENSES OF KARALIS P.C. AS BANKRUPTCY COUNSEL TO DOMUS BWW  
FUNDING, LLC AND 1801 ADMIN, LLC, THE DEBTORS,  
FOR THE PERIOD FROM MAY 4, 2022 THROUGH AUGUST 31, 2022**

**TO: THE HONORABLE ERIC L. FRANK, U.S. BANKRUPTCY JUDGE:**

Karalis PC (the “Applicant”), as bankruptcy counsel to Domus BWW Funding, LLC and 1801 Admin, LLC (collectively, the “Debtors”), in accordance with Federal Rule of Bankruptcy Procedure 2016 and Local Bankruptcy Rule 2016-2, applies under §§ 330 of title 11 of the United States Code for allowance of its first interim request for compensation and reimbursement of actual, necessary expenses (the “Application”) for the period from May 4, 2022 through August 31, 2022 (the “Compensation Period”) and in support thereof represents as follows:

**PART A Preliminary Statement**

1. Applicant is bankruptcy counsel to the Debtors, Domus BWW Funding, LLC and 1801 Admin, LLC, effective as of May 4, 2022.
2. All services rendered and expenses incurred for which compensation or reimbursement is requested were performed or incurred for or on behalf of the Debtors.
3. The services described in this Application are actual, necessary services and the compensation requested for those services is reasonable.
4. The expenses described in this Application are actual, necessary expenses.
5. The Applicant is holding a retainer in the amount of \$95,230.30 that will be applied

on account of its fees and expenses allowed by the Court.

6. This First Interim Application is for fees for services rendered and reimbursement of expenses incurred during the Compensation Period as follows:

**Compensation Period:** May 4, 2022 through August 31, 2022.

**First Interim Fee Application**

	<u>Requested</u>
Fees	\$268,255.00
Expenses	<u>\$ 3,323.36</u>
Total	\$271,578.36

**PART B General Information**

1. **General Information:**

- A. Date case filed: May 3, 2022
- B. Date application to approve employment filed: May 4, 2022
- C. Date employment approved: May 31, 2022
- D. First date services rendered in the case: May 3, 2022
- E. Compensation requested is under §330.
- F. Any fees awarded will be paid by the Debtors' estates.

2. **Prior Fee Applications**

No prior applications have been filed.

3. **Attorneys' Billing**

NAME PROFESSIONAL	OF	ADMITTED	RATE	HOURS	TOTAL
Aris J. Karalis		1988	\$550	288.30	\$158,565.00
Camille Spinale		1985	\$445	5.40	\$2,457.00
Robert Seitzer		2001	\$410	189.50	\$77,695.00
Eric R. Schachter		2022	\$275	92.80	\$25,520.00

NAME PROFESSIONAL	OF	ADMITTED	RATE	HOURS	TOTAL
<b>TOTAL</b>				<b>576.00</b>	<b>\$264,237.00</b>

#### Paraprofessionals Billing

NAME OF PROFESSIONAL	RATE	HOURS	TOTAL
Jill Hysley	\$140	28.70	\$4,018.00
<b>TOTAL</b>		<b>28.70</b>	<b>\$4,018.00</b>

#### 4. Billing Rates

The billing rates set forth in this application are the normal hourly rates charged by Applicant for the services rendered.

#### **Part C Billing Summary for the Compensation Period**

1. Description of Services. Compensation for services rendered and reimbursement for expenses is now sought for all reasonable and necessary activities performed in this case during the Compensation Period, including by categorical listing:

a. Assumption and Rejection of Leases and Contracts (Fees: \$4,834.00; Total Hours 9.10). This category represents time spent by Applicant during the Compensation Period related to the analysis of leases and executory contracts and reviewing with the Debtors their rights under the Bankruptcy Code to assume, reject or assign the underlying contracts.

b. Business Operations (Fees: \$1,155.00; Total Hours 2.10). This category represents time spent by Applicant during the Compensation Period related to the debtors in possession operating in chapter 11 such as employee, vendor, tenant issues, and other similar issues, matters and problems.

c. Case Administration (Fees: \$81,474.50; Total Hours 182.60). This category represents general case administration activities not covered by another category. During the Compensation Period, the Applicant coordinated first day motions, objections thereto, day-to-day administration of the cases, compliance activities, and discussed matters related thereto with the Debtors and their advisors.

d. Claims Administration and Objections (Fees: \$5,320.00; Total Hours 15.30). This category represents time spent by Applicant during the Compensation Period related to matters related to specific claim inquiries, bar date motions, objections and allowances of claims.

e. Employment and Fee Applications (Fees: \$45,339.00; Total Hours 109.60). This category represents time spent by Applicant during the Compensation Period preparing, reviewing, and filing applications to employ the Applicant and other professionals for the Debtors, objections thereto, and discussing with the Debtors and special counsel the fee application process in the Eastern District of Pennsylvania and mechanism to establish interim procedures for compensation.

f. DIP Financing (Fees: \$26,199.00; Total Hours 54.20). This category represents time spent by Applicant during the Compensation Period reviewing, analyzing, and negotiating DIP financing term sheets, and loan documents; preparing motions to approve DIP financing.

g. Meetings and communications with creditors (Fees: \$2,310.00; Total Hours 4.20). This category represents time spent by Applicant during the Compensation Period for and attendance at § 341(a) meeting and any other meetings with the Office of the United States Trustee and creditors.

h. Relief from Stay (*Matter of 47 East 34<sup>th</sup> Street (NY), L.P.*) (Fees:

\$55,371.50; Total Hours 124.20). This category represents time spent by Applicant during the Compensation Period related to obtaining Bankruptcy Court approval to modify the automatic stay to permit the continuation, commencement and adjudication of certain appeals with respect to the *Matter of 47 East 34<sup>th</sup> Street (NY), L.P.*

i. Relief from Stay (*Matter of GB-SP Holdings, LLC, et. al. v. Walker, et. al.*) (Fees: \$5,957.00; Total Hours 11.90). This category represents time spent by Applicant during the Compensation Period related to the modification of automatic stay under § 362 including the preparation of a Stipulation Modifying the Automatic Stay to resolve litigation in the Delaware Court of Chancery in *the Matter of GB-SP Holdings, LLC, et. al. v. Walker, et. al.*, and the motion to obtain Bankruptcy Court approval of the Stipulation.

j. Reporting (Fees: \$24,525.00; Total Hours 61.30). This category represents time spent by Applicant during the Compensation Period related to preparation and filing of statement of financial affairs, bankruptcy schedules, monthly operating reports, and any other accounting or reporting activities; contacts with United States Trustee not included in other categories.

k. Asset Analysis and Recovery (Fees: \$15,770.00; Total Hours 30.20). This category represents time spent by Applicant during the Compensation Period related to the collection of the Domus loan receivables.

B. The Applicant advised the Debtors with respect to all legal matters in connection with these bankruptcy cases and performed the professional services detailed in the attached Exhibits A through K. Detailed statements of each category of service (identified herein) pursuant to L.R.B.P. 2016-2 are attached hereto as Exhibits A through K and made a part hereof, which list the name of the professional or paraprofessional, date, activity, and time expended in connection with the services rendered. Applicant requests interim compensation of \$268,255.00 for 604.70

hours of services rendered and payment of such allowed amount.

**C. Summary of professional and paraprofessional time Expended by Category:**

<b><u>CATEGORY</u></b>	<b><u>HOURS</u></b>	<b><u>VALUE</u></b>	<b><u>EXHIBIT</u></b>
A) Assumption and Rejection of Leases and Contracts	9.10	\$4,834.00	A
B) Business operations – Issues related to DIP operating in chapter 11 and related matters	2.10	\$1,155.00	
C) Case Administration	182.60	\$81,474.50	C
D) Claims Administration and Objections: Claim inquiries, bar date motion, objections and allowances of claims	15.30	\$5,320.00	D
E) Employment and fee applications: Preparation of employment and fee applications for self and others	109.60	\$45,339.00	E
F) DIP Financing: Matters under §§ 361, 363 and 364; loan document analysis	54.20	\$26,199.00	F
G) Meetings and communications with creditors: Preparation for and attendance at § 341(a) meeting and any other meeting with creditors	4.20	\$2,310.00	G
H) Relief from Stay: <i>Matter of 47 East 34<sup>th</sup> Street (NY), L.P.</i>	124.20	\$55,371.50	H
I) Relief from Stay: <i>Matter of GB-SP Holdings, LLC, et. al. v. Walker, et. al.</i>	11.90	\$5,957.00	I
J) Reporting: Statement of financial affairs, schedules, monthly operating reports, and any other accounting or reporting activities; contacts with United States Trustee not included in other categories	61.30	\$24,525.00	J
K) Asset analysis and recovery: Domus loan receivables	30.20	\$15,770.00	K
<b>TOTAL</b>	<b>604.70</b>	<b>\$268,255.00</b>	

**Part D: Expense Summary for Compensation Period**

1. For the Compensation Period, Applicant expended \$3,323.36 for expenses in connection with serviced provided to the Debtors as bankruptcy counsel. Set forth in the attached Exhibit “L” is a list that shows the type of expenses for which reimbursement is sought. Scanning and duplicating charges are calculated at .20 per page. Fax charges are calculated at \$1.00 per fax. Postage, telephone costs, legal research costs, and Federal Express charges are actual charges

incurred.

2. Applicant seeks reimbursement of the full amount \$3,323.36 for such expenses.

**Part E: Request for Approval of Application**

1. The Applicant seeks approval and payment of compensation and expenses as set forth in this Application for services rendered and costs incurred during the Compensation Period.

2. The services rendered by the Applicant on behalf of the Debtors were reasonable, necessary and appropriate to the administration of this case.

3. The services rendered were performed economically, effectively, and efficiently and the results obtained benefitted the Debtors and the estates of the Debtors.

4. The services rendered for which Applicant seeks compensation in this Application were necessary and beneficial to the Debtors and the estates of the Debtors.

5. Accordingly, approval of the compensation sought herein is warranted.

**WHEREFORE**, the Applicant requests the entry of an Order (a) granting the Application of Applicant, (b) allowing compensation to Karalis PC in the amount of \$268,255.00 for services rendered and \$3,323.36 for reimbursement of expenses, for a total of \$271,578.36 due and payable for the Compensation Period, (c) authorizing payment of such allowed compensation to the Applicant, and (d) for such other and further relief as this Court deems just.

**Respectfully Submitted:**

**KARALIS PC**

By: /s/ Aris J. Karalis  
ARIS J. KARALIS  
1900 Spruce Street  
Philadelphia, PA 19103  
(215) 546-4500  
Attorneys to Debtors

Dated: October 3, 2022